

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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IN RE:

CORTLAND STANDARD PRINTING COMPANY,

Bankruptcy Number 25-30194

Debtor.

**MOTION TO SELL**

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NOW COMES THE TRUSTEE, Steven R. Dolson, Esq.; seeking an order pursuant to 11 U.S.C. §363(b)(1) and in support thereof affirms the following:

- 1.) That the above captioned matter was filed as a voluntary Chapter 7 on March 20, 2025.
- 2.) That the undersigned was appointed to serve as the Chapter 7 trustee on March 20, 2025.  
(See Docket #4)
- 3.) That the debtor in the above captioned matter is a domestic corporation formed by the filing of initial papers of incorporation with the New York Secretary of State on August 11, 1893.
- 4.) That the corporation's Chief Executive Officer was Evan Geibel on the date of filing and is currently listed as the corporation's agent for service of process with the Secretary of State. The debtor is represented in this matter by Maxsen Champion, Esq..
- 5.) That the principle place of business for the corporation is 110 Main Street; Cortland, NY 13045. (Docket #1; Page #1) This location is within the County of Cortland, State of New York.
- 6.) That the debtor has listed total assets of the corporate entity being valued at \$9,600.00.  
(Docket #1; Page 12)

- 7.) That the undersigned trustee has conducted a UCC Search with the Department of State, which, as of this date revealed no active liens having been filed against the debtor. The undersigned further conducted a search of the Cortland County Clerk's office, which, revealed no active liens having been filed against the debtor.
- 8.) The Trustee now seeks an order allowing the sale of the corporation's assets to Sample News Group as outlined in the attached purchase Letter of Intent. (Exhibit "A")
- 9.) That said sale specifically excludes all cash and cash equivalents possessed by the debtor.
- 10.) That in the trustee's business judgment he recommends that the Court approve the sale of the corporation's assets to Sample News Group, subject to better or higher offers at the hearing to be held on this motion.
- 11.) That the trustee asserts that a good business reason to permit the sale under 11 U.S.C. §363(b) to Sample News Group exists as a majority of the assets of the corporation are only of value to a specific industry, such as printing presses and paper rolls. These assets would be difficult to auction or move and are unlikely to result in a higher benefit to creditors. As such the Court should approve the motion. See In Re Iridium Operating, LLC 478 F. 3d 452, 465 (2<sup>nd</sup> Cir. 2007) *holding that a 363(b) sale is permissible in a circumstance where evidence presented at hearing shows a good business reason to grant the application.*
- 12.) The trustee also recommends approval of the motion to sell as the buyer (Sample News Group) has indicated a desire to re-constitute a newspaper business from the assets that would serve the Cortland area. In so doing the letter of intent from Sample News Group contemplates the need to assume potential vendor liabilities yet to be determined.

WHEREFORE, the undersigned trustee respectfully requests an Order of the Court allowing the trustee to conduct a sale pursuant to 11 U.S.C. §363(b) of the debtor's assets excluding cash and cash equivalent assets, for the amount of \$50,000.00 and as more fully outlined in the attached Letter of Intent to Sample News Group and for such other and further relief as the Court deems just and proper.

Dated: April 15, 2025

S/ Steven Dolson

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Chapter 7 Trustee  
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